

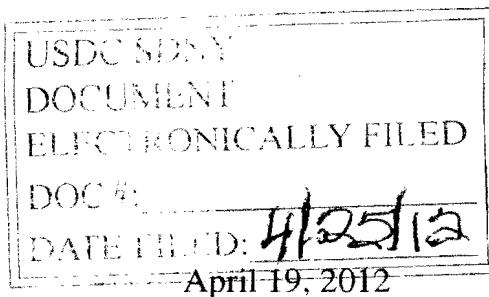
MEMO ENDORSED



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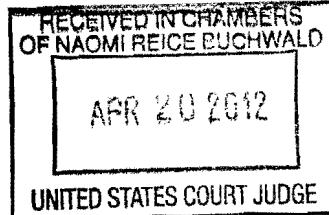
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VIA HAND DELIVERY

Hon. Naomi Reice Buchwald, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: JPMorgan Chase Bank, N.A. v. Yuen et al.
Index Number 11-CV-9192 (NRB)

Your Honor:

We represent Defendant George Yuen ("Yuen") in the above captioned matter. As the Court may recall, this case consists of an interpleader action commenced by Plaintiff JPMorgan Chase Bank, N.A. ("JPMC") regarding the distribution of the proceeds of a deferred compensation account (the "Account") previously held by the deceased, Robert von Tobien. Both defendants, George Yuen and Mr. Tobien's estate (the "Estate"), claim an entitlement to the proceeds of the Account.

On March 19, 2012, the Court held an initial conference in this matter. At that time, the Court directed the parties to exchange initial disclosures, and also directed that a deposition of JPMC occur on or before April 27, 2012. The parties exchanged their initial disclosures, and also produced certain responsive documents, including a production by JPMC of records in its possession concerning the deferred compensation account at issue in the interpleader action. On April 12, 2012, counsel for all parties met in person to discuss additional document discovery. Counsel for the Estate identified certain additional accounts -- including a 401K account, a JPM retirement account, and an insurance account -- held in Mr. von Tobien's name, for which records were requested. Counsel for JPMC agreed to conduct a search for records pertaining to beneficiary designations and any changes to same on these additional accounts and produce them as soon as possible.

Counsel for JPMC informs the parties that he will be in a position to produce records regarding these additional account, if still in existence and locatable, on or before May 3, 2012. Accordingly, the parties respectfully request a brief extension of the Court ordered deposition date of JPMC's witness from April 27, 2012, to May 30, 2012. In the meantime,

ENDORSED

Application
Granted.
Naomi Reice Buchwald
4/24/12

COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.
ATTORNEYS AT LAW

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the parties continue to move forward with discovery pursuant to the Court's March 16, 2012 discovery order, and do not anticipate a change in that schedule as a result of this request.

We thank the Court for its consideration herein.

Respectfully submitted,

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.



Jed M. Weiss

CC: Alun W. Griffiths, Esq. (Attorney for JPMorgan Chase Bank, N.A.) (via email)
John T. Morin, Esq., (Attorney for Estate of Robert Von Tobien) (via email)